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May 16, 2017

BY ECF

Honorable Ronnie Abrams
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Re: William R. Weinstein v. Donald J. Trump, et al., No. 17-cv-1018-RA [rel. No. 17-cv-458-RA] – Joint Letter-Motion Proposing Schedule for Filing Second Amended Complaint on Consent and Extending Time to File Responsive Papers

Dear Judge Abrams:

As Plaintiff Pro Se, and on behalf of all parties by their undersigned counsel, I respectfully submit this joint letter-motion proposing a schedule for the filing of a Second Amended Class Action Complaint on consent under Fed. R. Civ. P. 15(a)(2) and extending the time for the parties to file their papers in response.

The Complaint in this case was filed on February 10, 2017 (Dkt. No. 1), and this Court accepted the case as related to *CREW v. Trump*, No. 17-cv-458-RA, on February 15, 2017. By joint letter filed March 3, 2017 (Dkt. No. 14), the parties made their first request for a proposed extension of the briefing schedule, and the Court approved the proposed schedule by its March 6, 2017 memo endorsement (Dkt. No. 15), as follows: (i) all Defendants' responses to the Complaint, including any dispositive motions, due May 18, 2017; (ii) Plaintiff's oppositions to any dispositive motions due June 26, 2017; and (iii) all Defendants' replies due July 24, 2017.

On March 7, 2017, I filed an Amended Class Action Complaint as of right under Fed. R. Civ. P. 15(a)(1)(A) (Dkt. No. 16). Since filing the Amended Complaint, there have been additional factual developments that I consider relevant and potentially appropriate for inclusion in a Second Amended Class Action Complaint. Among these developments is the April 21, 2017 letter issued by the House Committee on Oversight and Government Reform to President Trump's tax counsel, Sheri A. Dillon, requesting the production of documents by May 12, 2017, and a Committee staff briefing on May 19, 2017, regarding the plan described in the Amended Complaint to donate to the United States Treasury the profits derived from foreign government payments. *See, e.g.*, Amended Complaint ¶¶ 8, 9, 14.

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To allow time to monitor the developments regarding the Committee actions before filing the Second Amended Complaint, Defendants have consented under Fed. R. Civ. P. 15(a)(2) to my proposal to file it by June 2, 2017. The parties have further agreed to the following revised schedule for the filing of papers responsive to the Second Amended Complaint: (i) all Defendants' responses, including any dispositive motions, due July 7, 2017; (ii) Plaintiff's oppositions to any dispositive motions due August 18, 2017; and (iii) all Defendants' replies due September 29, 2017.

Accordingly, the parties respectfully request that their joint proposed revised schedule be approved by the Court.

Respectfully submitted,

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